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Attorneys for Plaintiff-Intervenors Carol Christopher, Julie Bhend and Carmela Chamara

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

and

CAROL CHRISTOPHER, JULIE BHEND,
and CARMELA CHAMARA,

Plaintiff-Intervenors,

vs.

NATIONAL EDUCATION
ASSOCIATION and
NATIONAL EDUCATION
ASSOCIATION - ALASKA,

Defendant.

Civil No. A01-0225CV (JKS)

[PROPOSED] ORDER REGARDING CONDUCT OF MEDIATION
[Local Rule 16.2(e)(1)]

Pursuant to Local Rule 16.2(e)(1), the court hereby enters the following order regarding mediation in this matter.

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1 [A] The mediator agreed upon by the parties is Thomas M. Daniel, Perkins Coie LLP, 1029 W.
2 3rd Ave., Anchorage, Alaska 99501.

3 [B] Confidential mediation statements are to be submitted to the mediator by February 21, 2006,
4 and are not to exceed 10 pages.

5 [C] The mediator charges \$275 per hour, with eight (8) hours payable in advance, and the parties
6 (plaintiff, plaintiff-intervenors, defendant NEA and defendant NEA-Alaska) agree to pay twenty-five
7 (25) percent each of the mediator's fee.

8 [D] The mediation will commence at 8:30 a.m. on February 23, 2006 at the offices of the
9 mediator. The mediation will go no longer than 5:00 p.m. on February 23, 2006.

10 [E] Plaintiff EEOC will be represented by Regional Attorney William Tamayo and Senior Trial
11 Attorney Carmen Flores. Plaintiff-intervenors Carol Christopher, Carmela Chamara and Julie Bhend
12 will be present, with their counsel, Terry A. Venneberg and Kenneth Friedman. Those present on behalf
13 of plaintiff and plaintiff-intervenors will have full authority to approve any proposed settlement.
14 Defendant NEA-Alaska will be represented by President Bill Bjork and Business Manager Kaye
15 Sullivan. Defendant NEA will be represented by Joann Waller, Regional Director for the Pacific Region.
16 Those present on behalf of NEA-Alaska will have full authority to approve any proposed settlement,
17 subject to ratification by NEA-Alaska's governing body. Those present on behalf of NEA will have
18 substantial influence in whether a proposed settlement should be approved, subject to ratification by
19 NEA's governing body, appropriate representatives of which, with full authority for settlement, will be
20 readily available by telephone.

21 The above proposed Order has been reviewed and approved by counsel for all parties.

22 DATED this ____ day of _____, 2006.

23
24 _____
25 James K. Singleton
26 U.S. District Court Judge

27 **Terry A. Venneberg**
28 Attorney at Law
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